

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

**BIANCA TIEPPO and NATALIE  
FARMER, Each Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFFS**

vs.

No. 1:22-cv-970-ADA

**SW MANAGEMENT GROUP, LLC**

**DEFENDANT**

**JOINT MOTION FOR EXTENSION OF  
DISCOVERY AND RELATED DEADLINES**

Plaintiffs Bianca Tieppo and Natalie Farmer (“Plaintiffs”), each individually and on behalf of all others similarly situated, and Defendant SW Management Group, LLC, by and through their undersigned counsel, for their Joint Motion for Extension of Discovery and Related Deadlines, hereby state as follows:

1. On February 16, 2023, the parties filed a Proposed Scheduling Order in which they proposed numerous deadlines, including September 5, 2023 for completion of fact discovery and October 5, 2023 for dispositive motions.
2. On February 24, 2023, in its Order Setting Initial Pretrial Conference, the Court tentatively approved the parties’ Proposed Scheduling Order and instructed that the parties comply with the dates set forth therein pending the initial pretrial conference, which was scheduled for July 14, 2023.
3. Before the pretrial conference, this case was reassigned to the Honorable Judge Alan D. Albright.

4. The pretrial conference did not take place on July 14, 2023, and instead, the Court instructed the parties to meet and confer to select a trial date for the case.

5. The parties did so, and trial in this matter has been tentatively schedule for June 10, 2024. The parties were instructed to prepare a new proposed scheduling order, which they submit herewith.

6. The Parties have worked together, and are continuing to work together, in litigating this case. The Parties have discussed the potential of resolving this case without the further need of litigation. The Parties anticipate further exploring a potential resolution to this case within the next few weeks.

7. In an effort to work toward a potential resolution, the Parties have informally exchanged time and pay documents. The Parties have also exchanged written discovery requests and are in the process of completing written discovery.

8. The Parties would like additional time to explore a potential resolution while also trying to keep the costs of litigation down. The Parties are optimistic that they may be able to resolve this case amongst themselves.

9. Both Parties, however, require additional time to complete discovery. The Parties are currently in the process of completing written discovery but need additional time to review written discovery responses, and the Parties need additional time to schedule depositions of witnesses, if the Parties believe it is necessary after they have finished reviewing written discovery responses, and if the Parties are unable to resolve this case before then. With additional time, the Parties will be able to fully develop the factual record in this case.

10. The Parties do not anticipate that an extension will affect the trial setting of June 10, 2024.

11. Accordingly, the Parties request an extension of the discovery and dispositive motion deadlines.

12. Specifically, the Parties request that the discovery deadline be extended up to and including December 29, 2023, and that the dispositive motion deadline be extended up to and including February 16, 2024.

WHEREFORE, Plaintiffs Bianca Tieppo and Natalie Farmer, and Defendant SW Management Group, LLC, respectfully request that the Court extend the discovery deadline up to and including December 29, 2023, and that the dispositive motion deadline be extended up to and including February 16, 2024.

Respectfully submitted,

**PLAINTIFFS BIANCA TIEPPO and  
NATALIE FARMER**

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**CERTIFICATE OF SERVICE**

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing MOTION was filed via the CM/ECF system, which will provide notice to the following attorneys of record:

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/s/ Colby Qualls  
**Colby Qualls**